

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN C. RAYBURN,

Plaintiff,

v.

STAFFILINO CHEVROLET, INC.,  
ANTHONY STAFFILINO, and  
SANTANDER CONSUMER USA INC.,

Defendants.

Civil Action 2:18-cv-1534

Judge George C. Smith

Magistrate Judge Kimberly A. Jolson

**JOINT MOTION TO STAY LITIGATION PENDING MEDIATION**

Plaintiff John C. Rayburn and Defendant Santander Consumer USA Inc. ("SC"), by and through their respective counsel, hereby move this Court to stay this litigation, including, but not limited to, the deadlines set forth in the Court's January 23, 2019 Memorandum of First Pretrial Conference, for a period of ninety (90) days.<sup>1</sup>

The parties have agreed to mediate this case. To that end, SC has been gathering and compiling data for the thousands of consumers who are putative class members in this case, based on criteria that were provided by Plaintiff's counsel. SC anticipates that its data compilation will be completed by June 30, 2019. SC has agreed to share the results of its data compilation with Plaintiff's counsel. The parties have agreed to schedule a mediation with a private mediator promptly after the production of SC's data compilation.

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<sup>1</sup> Plaintiff voluntarily dismissed his claims against Defendants Staffilino Chevrolet, Inc. and Anthony Staffilino on May 13, 2019. (ECF 26).

The requested stay will allow the Parties sufficient time to thoroughly explore settlement opportunities without incurring substantial additional litigation costs. The Parties shall file a report with the Court within fourteen days of the completion of the mediation.

Respectfully submitted,

/s/ Ronald I. Frederick

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 20, 2019.

/s/ K. Issac deVyver